

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----x  
:  
In re : Chapter 9  
:  
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
:  
Debtor. : Hon. Steven W. Rhodes  
:  
-----x

**SECOND STIPULATION FOR AN ORDER EXTENDING DEADLINE FOR  
MICHIGAN AFSCME COUNCIL 25 AND ITS AFFILIATED DETROIT  
LOCALS TO FILE MOTION UNDER BANKRUPTCY RULE 3018**

The City of Detroit (the "City") and Michigan AFSCME Council 25 and its affiliated Detroit Locals ("AFSCME" and, together with the City, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. On February 21, 2014, AFSCME filed proof of claim number 2958 asserting liabilities against the City in the aggregate amount of not less than \$8,718,697,854.82 (the "AFSCME Claim").
2. Also on February 21, 2014, the Coalition of Detroit Unions, of which AFSCME is a member, filed proof of claim number 2851 asserting liabilities against the City in the aggregate amount of \$242,586,116.50 (the "Coalition Claim" and, together with the AFSCME Claim, the "Claims").

3. On March 11, 2014, the Court entered the Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Adjustment and (II) Approving Notice Procedures Related to Confirmation of the Plan of Adjustment (Docket No. 2984) (the "Solicitation Procedures Order").

4. Pursuant to the tabulation rules set forth on Exhibit 1 to the Solicitation Procedures Order (the "Tabulation Rules"):

if the City has filed and served an objection to a claim by May 15, 2014, such claim will be temporarily allowed or disallowed for voting purposes in accordance with the relief sought in the objection. If an objection does not identify the proposed amount of a claim (e.g., if the claim remains subject to estimation or liquidation), then such claim will be temporarily allowed in the amount of \$1.00.

Tabulation Rules, at § VII.

5. Pursuant to the Solicitation Procedures Order, any claimant seeking treatment of a claim for voting purposes other than in accordance with the Tabulation Rules must file a motion under Rule 3018 of the Federal Rules of Bankruptcy Procedure (a "Rule 3018 Motion") by the later of: (a) May 1, 2014; or (b) 10 days after the date of service of a notice of objection, if any, to the applicable claim. Solicitation Procedures Order, at ¶ 13.

6. On May 15, 2014, the City filed and served objections to (a) the Coalition Claim (Docket No. 4874) and (b) the AFSCME Claim (Docket No. 4876). Accordingly, the deadline for AFSCME to file any Rule 3018 Motion

(the "Rule 3018 Motion Deadline") with respect to the Claims is Tuesday, May 27, 2014.

7. On May 27, 2014, the Parties filed the Stipulation for an Order Extending Deadline for Michigan AFSCME Council 25 and Its Affiliated Detroit Locals to File Motion Under Bankruptcy Rule 3018 (Docket No. 5037) (the "First Stipulation"). By the First Stipulation, the Parties requested that the Court extend the Rule 3018 Motion Deadline with respect to the Claims to May 30, 2014. By an order entered on the date hereof, the Court granted the relief requested by the Parties in the First Stipulation.

8. The Parties: (a) have agreed to further extend the Rule 3018 Motion Deadline through and including Friday, June 6, 2014; and (b) request that the Court enter the proposed Order attached hereto as Exhibit 1 approving this Stipulation.

[REMAINDER OF PAGE INTENTIONALLY BLANK]

Dated: May 29, 2014

/s/ Sharon L. Levine

Sharon L. Levine  
Philip J. Gross  
LOWENSTEIN SANDLER LLP  
65 Livingston Avenue  
Roseland, New Jersey 07068  
Telephone: (973) 597-2500  
Facsimile: (973) 597-6247  
[slevine@lowenstein.com](mailto:slevine@lowenstein.com)  
[pgross@lowenstein.com](mailto:pgross@lowenstein.com)

Herbert A. Sanders  
THE SANDERS LAW FIRM PC  
615 Griswold St., Suite 913  
Detroit, MI 48226  
Telephone: (313) 962-0099  
Facsimile: (313) 962-0044  
[hsanders@miafscme.org](mailto:hsanders@miafscme.org)

Richard G. Mack, Jr., Esq.  
MILLER COHEN PLC  
600 West Lafayette Boulevard  
4th Floor  
Detroit, MI 48226-3191  
Telephone: (313) 566-4787  
Facsimile: (313) 964-4490  
[richardmack@millercohen.com](mailto:richardmack@millercohen.com)

ATTORNEYS FOR AFSCME

/s/ Heather Lennox

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
[dgheiman@jonesday.com](mailto:dgheiman@jonesday.com)  
[hlennox@jonesday.com](mailto:hlennox@jonesday.com)

Bruce Bennett (CA 105430)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539  
[bbennett@jonesday.com](mailto:bbennett@jonesday.com)

Jonathan S. Green (MI P33140)  
Stephen S. LaPlante (MI P48063)  
MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
[green@millercanfield.com](mailto:green@millercanfield.com)  
[laplante@millercanfield.com](mailto:laplante@millercanfield.com)

ATTORNEYS FOR THE CITY

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----x  
:  
In re : Chapter 9  
:  
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
:  
Debtor. : Hon. Steven W. Rhodes  
:  
-----x

**SECOND ORDER EXTENDING DEADLINE FOR MICHIGAN  
AFSCME COUNCIL 25 AND ITS AFFILIATED DETROIT  
LOCALS TO FILE MOTION UNDER BANKRUPTCY RULE 3018**

This matter came before the Court on the Second Stipulation for an Order Extending Deadline for Michigan AFSCME Council 25 and Its Affiliated Detroit Locals to File Motion Under Bankruptcy Rule 3018 (the "Stipulation"),<sup>1</sup> filed by the City of Detroit (the "City") and Michigan AFSCME Council 25 and Its Affiliated Detroit Locals ("AFSCME" and, together with the City, the "Parties"); the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court being fully advised in the premises;

---

<sup>1</sup> Capitalized terms not defined herein have the meanings given to them in the Stipulation.

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. The deadline for AFSCME to file any Rule 3018 Motion with respect to the Claims is hereby extended to June 6, 2014.
3. The relief granted herein is without prejudice to the right of the Parties to agree upon further extensions of the Rule 3018 Motion Deadline, subject to approval by the Court.

**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Second Stipulation for an Order Extending Deadline for Michigan AFSCME Council 25 and Its Affiliated Detroit Locals to File Motion Under Bankruptcy Rule 3018 was filed and served via the Court's electronic case filing and noticing system on this 29th day of May, 2014.

/s/ Heather Lennox